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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

BRYAN WAYNE CRAWLEY,

Petitioner,

vs.

BRAD CAIN, *et al.*,

Respondents.

Case No. 2:17-cv-02086-RFB-CWH

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME  
(FIRST REQUEST)**

Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, respectfully move this Court for an order granting a seven (7) day enlargement of time, to and including July 8, 2022, in which to file and serve the reply in support of the motion to dismiss.

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings, and other materials on file herein.

This is my first enlargement of Respondents' time to file said reply, and this motion is made in good faith and not for the purposes of delay.

RESPECTFULLY SUBMITTED this 30th day of June, 2022.

AARON D. FORD  
Attorney General

By: /s/ Heather D. Procter  
HEATHER D. PROCTER (Bar No. 8621)  
Chief Deputy Attorney General

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

BRYAN WAYNE CRAWLEY,  
Petitioner,

vs.

BRAD CAIN, *et al.*,  
Respondents.

Case No. 2:17-cv-02068-RFB-CWH  
**DECLARATION OF COUNSEL**

STATE OF NEVADA            )  
  : ss.  
CARSON CITY                )

I, HEATHER D. PROCTER, hereby state, based on personal knowledge and/or information and belief, that the assertions of this declaration are true:

1. I am the Chief Deputy Attorney General of the Post-Conviction Division of the Nevada Attorney General's Office, and I make this declaration on behalf of Respondents' motion for enlargement of time.

2. By this motion, I am requesting a one-week (7) day enlargement of time, to and including July 8, 2022, to respond in support of Respondents' motion to dismiss. This is my first request for enlargement.

3. The response is currently due July 1, 2022.

4. Since receiving the opposition to motion to dismiss, I have been involved in working on Ninth Circuit answering briefs in *Howard v. Gittere*, No. 10-99003, and *Doyle v. Gittere* (death penalty),

No. 20-99013. While I am nearly done with my reply in this case, I wish to have additional time after the upcoming Independence Day holiday to review my final response. As such, I request a seven (7) day enlargement of time, to and including July 8, 2022, to respond in support of the motion to dismiss.

5. This motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case.

6. I contacted Federal Public Defender Alicia Intriago, who has no objection to this enlargement.

Pursuant to 28 U.S.C. § 1746, Declarant herein certifies, under penalty of perjury, that the foregoing is true and correct.

By: /s/ Heather D. Procter  
HEATHER D. PROCTER (Bar No. 8621)  
Chief Deputy Attorney General

**ORDER**

IT IS SO ORDERED.

Dated this 1st day of July, 2022.

  
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RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General and that on this 30th day of June, 2022, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)**, by U.S. District Court CM/ECF electronic filing to:

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Assistant Federal Public Defender  
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/s/ Brittany J. \_\_\_\_\_